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*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CHARLENE BYNUM individually, as the  
wife of RONALD BYNUM and as the  
Guardian of the Person and Estate of  
RONALD BYNUM,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS; JACOB  
RAY (P#1886); RODRIGO DELARA  
(P#2417); JOHN E TONRY (P#1684)  
;JESSE LEE CESENA (P#2425);  
ALEXANDER PEREZ; JEFFREY K.  
LYTLE; YAPHET MILLER; JOHN  
LANSING; SCOTT NIELSEN; STEVEN  
MCKLEIN CITY OF LAS VEGAS;  
MICHELLE FREEDMAN; CITY OF LAS  
VEGAS CORRECTIONAL OFFICERS:  
ALGIN BROOKS, ANGEL JONES,  
ASHWORTH, CORY PRICE,  
DANIELLE STONE, GABRIELLE  
ABBOT, JASON JONES, JENNIFER  
BRADFORD, JOSHUA LOPER, JULIO  
OLARTE, KATHLEEN HENLEY, L.  
HENDERSON, LANDROVE, LEIGH  
MANN, LORIN SMITH, M. SZOSTEK,  
MARCOS PARKER, MICHAEL  
DARREN, MILETTE JONES, OFFICER  
CREAGER, OFFICER EDWARDS,  
OFFICER JERNEE, OFFICER KAHELE,  
OFFICER KATZ, OFFICER MANRA,  
OFFICER MARKITZ, OFFICER  
ROGERS, RAMON BROOKINS,  
ROBERT MORRIS, S. MARTINEZ,  
Sergeant B. GRIFFITH, Sergeant  
KELLEHER, SERGEANT ALVIN  
KENON, Sergeant LARRY GRAVES,  
SCOTT EDWARDS, STEVE CHESNEY,  
TRAVIS ROZ, WESLEY STONE,  
SERGEANT DENT, CESAR  
LANDROVE; CORRECT CARE  
SOLUTIONS. LLC. a Purported Kansas

CASE NO. 2:17-cv-2102-APG-VCF

Consolidated with:

CASE NO. 2:18-cv-00354-APG-VCF

**STIPULATION  
TO  
EXTEND TIME FOR PLAINTIFF  
TO FILE HER REPLY RE:  
1) PLAINTIFF'S MOTION FOR  
RECONSIDERATION OF ORDER ON  
MOTIONS FOR SUMMARY  
JUDGMENT (#191) AS TO THE LV  
AND CSS DEFENDANTS LR 59.1  
(DOC. 202)  
AND  
2) PLAINTIFF'S MOTION FOR  
RECONSIDERATION OF ORDER ON  
MOTIONS FOR SUMMARY  
JUDGMENT (#191) AS TO NLV  
DEFENDANTS LR 59.1 (DOC. 203)**

**FIRST REQUEST**

Defendants.

The parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend the deadline for Plaintiff to file replies to the defendants' Oppositions to Plaintiff's Motions for Reconsideration (Doc. 202 and Doc 203) in the above captioned case, up to and including January 18<sup>th</sup>, 2021.

This request for an extension of time is not sought for any improper purpose or other purpose of delay. Plaintiff seeks this extension due to the complexities of the issues and planned vacations over the Christmas Holidays.

Wherefore, the parties respectfully request that this Court extend the time for Plaintiff to file her Reply re Plaintiff's Motions for Reconsideration (Doc. 202 and Doc 203), up to and including January 18th, 2021

DATED: December 14th, 2020

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LAW OFFICE OF DAN M. WINDER,  
P.C.

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*Attorneys for Correct Care Solutions, LLC*

1 DATED: December 14th, 2020

DATED: December 14th, 2020

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4  
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*Officers Jacob Ray, Rodrigo Delara,*

*John E. Tonry, Jesse Lee Cesena,*

*Chief Alexander Perez,*

*and Fire Chief Jeffrey K. Lytle*

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12 **IT IS SO ORDERED**

13 **DATED:** December 14, 2020

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16 **UNITED STATES DISTRICT JUDGE**